

FILED

JUN 14 2004

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DIANE BOND,

Plaintiff,

v.

NO. 04 C 2611

CHICAGO POLICE OFFICERS EDWIN
UTRERAS, (Star No. 19901), ANDREW
SCHOEFF, (Star No. 4436), CHRIST SAVICKAS,
(Star No. 5991), ROBERT STEGMILLER,
(Star No. 18764), JOSEPH SEINITZ, (Star No.
4947), ROBERT SCHULTZ (Star No. 13882)
NICHOLAS CORTESI, (Star No. 15112)
JOHN CANNON, (Star No. 12241),
ROBERT FRANKS, (Star No. 15935),
WAYNE NOVY (Star No. 2733) and JOHN
DOES ONE through FIVE, in their individual
capacities; and the CITY OF CHICAGO

Defendants.

Judge Lefkow

DOCKETED
JUN 23 2004

**INDIVIDUAL DEFENDANTS'
AGREED MOTION TO ENLARGE TIME
TO ANSWER OR OTHERWISE PLEAD**

Individual Defendants, Edwin Utreras Star #19910, Christ Savickas, Star #5991, Robert Stegiller, Star #18764, Joseph Seintiz, Star #4947, Robert Schultz, Star #13882, Nicholas Cortesi, Star #15112, John Cannon, Star # 12241, Wayne Novy, Star #2733, by one of their attorneys, Thomas J. Platt, Assistant Corporation Counsel of the City of Chicago, respectfully request this Honorable Court to enlarge the time in which defendants, may answer or otherwise plead to plaintiff's complaint, stating as follows:

- (1) The undersigned filed his Appearance for defendants on June 9, 2004.
- (2) This motion is defendant's first request for an enlargement of time to answer or otherwise plead.

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(3) The undersigned has not as yet received the Chicago Police Department records on this incident.

(4) The undersigned has not yet been able to interview the police personnel necessary to answer or otherwise plead to the complaint herein.

(5) Two of the named defendants have not yet been served with summons and complaint.

(6) Counsel for plaintiff, Craig Futterman stated on June 9, 2004 that he did not oppose this motion.

WHEREFORE, defendants Edwin Utreras Star #19910, Christ Savickas, Star #5991, Robert Stegiller, Star #18764, Joseph Seintiz, Star #4947, Robert Schultz, Star #13882, Nicholas Cortesi, Star #15112, John Cannon, Star # 12241, Wayne Novy, Star #2733 Kevin Killen and David Tencza, request this court to:

A. Grant their motion for an enlargement of time to and including July 16, 2004 to answer or otherwise plead to the complaint.

B. Reset the June 24, 2004 status until a date after July 16, 2004.

Respectfully submitted,


THOMAS S. PLATT
Assistant Corporation Counsel

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SUITE 900
CHICAGO, ILLINOIS 60602
(312) 744-4833
ATTORNEY NO. 06181260

June 11, 2004

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have caused true and correct copies of the above and foregoing **NOTICE OF MOTION and DEFENDANTS' MOTION TO ENLARGE TIME TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFFS COMPLAINT** to be hand mailed to the persons named in the foregoing Notice, on June 11, 2004



THOMAS J. RLATT